

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR THE REGISTERED HOLDERS OF AMHERST PIERPOINT COMMERCIAL MORTGAGE SECURITIES LLC, MULTIFAMILY MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2019- SB59,	:	
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	:	
	:	CIVIL ACTION
	:	
	:	NO. 2:25-CV-00157-ES-JSA
	:	
	:	
	:	
Plaintiff,	:	
	:	
	:	
v.	:	
	:	
	:	
MICH 424 PARK LLC,	:	
	:	
	:	
Defendant.	:	

## DECLARATION OF RAYMOND A. QUAGLIA

Pursuant to 28 U.S.C. § 1746, Raymond A. Quaglia hereby declares as follows:

1. I am a partner with the law firm of Ballard Spahr LLP, counsel for the Plaintiff/Lender (“Lender”) in this commercial mortgage foreclosure action.
2. I respectfully submit this declaration for the limited purpose of introducing certain evidence of public record in support of Lender’s motion to appoint a receiver for the mortgaged property.

3. Attached hereto as ***Exhibit 1*** is the filed Certificate of Formation and Operating Agreement of Defendant, MICH 424 Park LLC (“Borrower”), which identifies Boruch Drillman as the sole member of Borrower. *See* Ex. 1 (Operating Agreement) § 4.

4. On December 13, 2023, Mr. Drillman pleaded guilty before U.S. District Judge Robert Kirsch of this Court to having engaged in a multi-year conspiracy to fraudulently obtain more than \$165 million in loans and fraudulently acquire multifamily and commercial properties. Copies of the docket in *USA v. Drillman*, No. 3:23-cr-01053 (D.N.J.), and the press release issued by the Department of Justice on December 14, 2023, are attached hereto as ***Exhibits 2 and 3***, respectively.

5. As reflected on the docket, Mr. Drillman is scheduled to be sentenced on May 13, 2025. *See* Ex. 2 (Docket).

6. As evidenced by the records of the New Jersey Secretary of State attached hereto as ***Exhibit 4***, the State of New Jersey revoked Borrower’s corporate charter effective January 17, 2023, due to Borrower’s failure to file an annual report since 2018. *See* Ex. 4 (NJ Records) at p. 2.

7. As evidenced by the New Jersey tax & assessment search attached hereto as ***Exhibit 5***, Borrower is presently delinquent on its payments to the East Orange Water Commission and the East Orange Department of Public Works

and has exposed the property to at least one lien, which was sold to a third party on December 4, 2024.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Dated: January 22, 2025

/s/ Raymond A Quaglia  
Raymond A. Quaglia